

EXHIBIT A

CASE 20-cv-00030

MAHARA

PAGE 2

SECURITY SERVICES

VS. SECURITY SERVICES US

LINE DATE ACTION

1 12/14/20 *CASE INFO SHEET (J) SUM 5 1 COPY: 1 PER: 8/100
2 12/23/20 *1ST PR SS CTD 12/22/20; SUM X/RET 11/22/20 SSI AS TO SECURITY
3 SECURITY SERVICES USA INC
4 12/23/20 LX E-CERT FROM SS

A TRUE COPY

1/13/2021
Cathy Scott
CLERK
US DIST COURT S.W. DIST. OF WA
BRO

West Virginia
Circuit Express

(/DEFAULT.ASPX)

Civil

Case Information

Thirteenth Judicial Circuit of Kanawha County

20-C-1066

Judge: CARRIE WEBSTER

LUCINDA JARRELL VS. SECURITAS SECURITY SERVICES USA, INC.

Plaintiff(s)Plaintiff Attorney(s)

JARRELL, LUCINDA

JOHN-MARK ATKINSON

Defendant(s)Defendant Attorney(s)INC., SECURITAS SECU
SECURITAS SECURITY SERVICES US

N/A

Date Filed: 12/14/2020

Case Type: DISCRIMINATION

Appealed: 0

Final Order Date: N/A

Statistical Close Date: N/A

| <u>Line</u> | <u>Date</u> | <u>Action / Result</u> |
|-------------|-------------|------------------------------------------------------------------|
| 0001 | 12/14/2020 | *CASE INFO SHEET; C; SUM & 1 CPY; F FEE; \$200 |
| 0002 | 12/28/2020 | @ LET FR SS DTD 12/22/20; SUM W/RET (12/22/20 SS) AS TO SECURITA |
| 0003 | | SECURITY SERVICES USA INC |

These materials have been prepared by the Office of the Clerk of the various Circuit Courts from original sources and data believed to be reliable. The information contained herein, however, has not been independently verified by the Office of the Clerk or Software Computer Group, Incorporated. The Office of the Clerk of the Circuit Courts and Software Computer Group, Inc. assume no liability for the accuracy, completeness, or timeliness of the information contained herein.



**Service of Process
Transmittal**

12/28/2020

CT Log Number 538800075

TO: Josiah Rocha
Securitas Security Services USA, Inc.
4330 Park Terrace Dr
Westlake Village, CA 91361-4630

RE: Process Served in West Virginia

FOR: Securitas Security Services USA, Inc. (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: LUCINDA JARRELL, PLTF. vs. SECURITAS SECURITY SERVICES USA, INC., DFT.

DOCUMENT(S) SERVED: -

COURT/AGENCY: None Specified
Case # 20C1066

NATURE OF ACTION: Employee Litigation - Wrongful Termination

ON WHOM PROCESS WAS SERVED: National Registered Agents, Inc., Charleston, WV

DATE AND HOUR OF SERVICE: By Certified Mail on 12/28/2020 postmarked on 12/23/2020

JURISDICTION SERVED : West Virginia

APPEARANCE OR ANSWER DUE: None Specified

ATTORNEY(S) / SENDER(S): None Specified

ACTION ITEMS: CT has retained the current log, Retain Date: 12/28/2020, Expected Purge Date: 01/27/2021

Image SOP

Email Notification, Josiah Rocha JOSIAH.ROCHA@SECURITASINC.COM

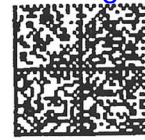
Email Notification, Laura Polte Laura.Polte@securitasinc.com

Email Notification, Cortney Sigman cortney.sigman@securitasinc.com

REGISTERED AGENT ADDRESS: National Registered Agents, Inc.
1627 Quarrier St
Charleston, WV 25311
866-331-2303
CentralTeam1@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

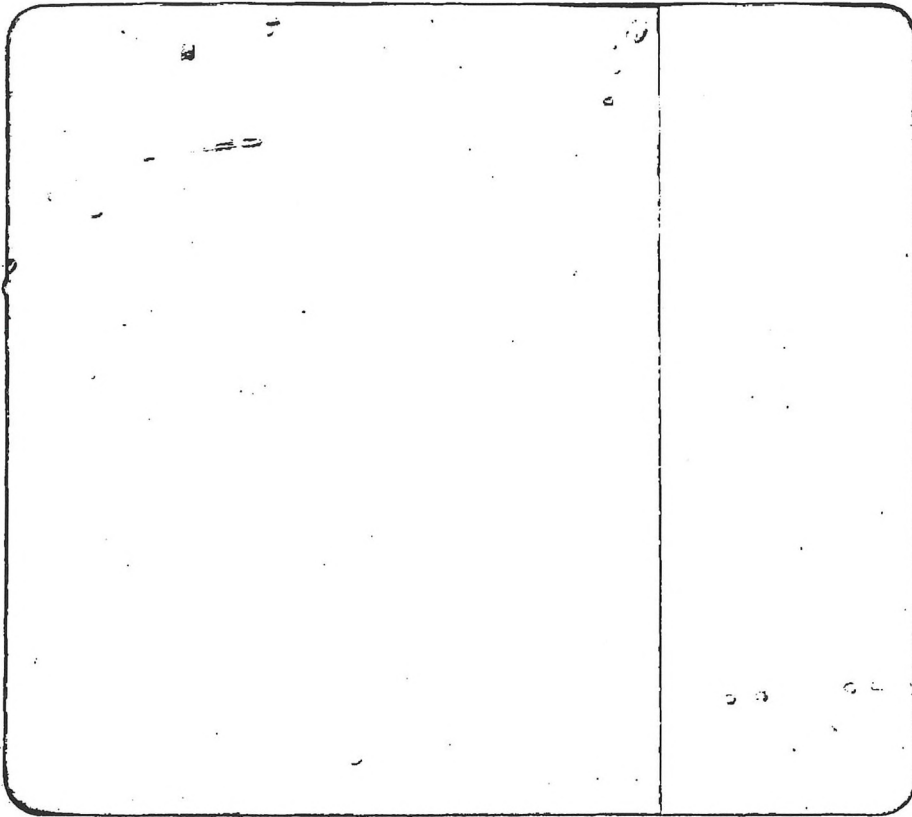
CERTIFIED MAIL



U.S. POSTAGE >> PITNEY BOWES



ZIP 25311 \$ 006.45⁰
02 4W
0000336734 DEC. 23, 2020



Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305



Mac Warner
Secretary of State
State of West Virginia
Phone: 304-558-6000
888-767-8683
Visit us online:
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9214 8901 1251 3410 0002 9711 65

SECURITAS SECURITY SERVICES USA, INC.
NATIONAL REGISTERED AGENTS, INC.
1627 QUARRIER STREET
CHARLESTON, WV 25311

Control Number: 268104

Defendant: SECURITAS SECURITY SERVICES
USA, INC.
1627 QUARRIER STREET
CHARLESTON, WV 25311 US

Agent: NATIONAL REGISTERED AGENTS,
INC.

County: Kanawha

Civil Action: 20-C-1066

Certified Number: 92148901125134100002971165

Service Date: 12/22/2020

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in the name and on behalf of your corporation.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in the name and on behalf of your corporation as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

A handwritten signature in cursive script that reads "Mac Warner".

Mac Warner
Secretary of State

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

CIVIL CASE INFORMATION STATEMENT
 (Civil Cases Other than Domestic Relations)

2020 DEC 18 PM 1:48
 CA-100-19-00019
 CIVIL CASE
 CIRCUIT COURT

I. CASE STYLE:

Plaintiff(s)

LUCINDA JARRELL

Case No. 20-CV-00019

Judge: Webster

Plaintiff's Phone: _____

vs.

Defendant(s)

SECURITAS SECURITY SERVICES USA, INC.

Name

Days to

Answer 30

Type of Service

Secretary of State

Defendant's Phone: _____

Street Address _____

City, State, Zip Code _____

II. TYPE OF CASE:

☐ General Civil

☐ Mass Litigation [As defined in T.C.R. 26.04(a)]

☐ Asbestos

☐ FELA Asbestos

☐ Other: _____

☐ Habeas Corpus/Other Extraordinary Writ

☒ Other: Employment

☐ Adoption

☐ Administrative Agency Appeal

☐ Civil Appeal from Magistrate Court

☐ Miscellaneous Civil Petition

☐ Mental Hygiene

☐ Guardianship

☐ Medical Malpractice

III. JURY DEMAND: ☒ Yes ☐ No CASE WILL BE READY FOR TRIAL BY (Month/Year): 12 / 2021

IV. DO YOU OR ANY OF YOUR CLIENTS OR WITNESSES IN THIS CASE REQUIRE SPECIAL ACCOMMODATIONS?

☐ Yes ☒ No

IF YES, PLEASE SPECIFY:

☐ Wheelchair accessible hearing room and other facilities

☐ Reader or other auxiliary aid for the visually impaired

☐ Interpreter or other auxiliary aid for the deaf and hard of hearing

☐ Spokesperson or other auxiliary aid for the speech impaired

☐ Foreign language interpreter-specify language: _____

☐ Other: _____

Attorney Name: John-Mark Atkinson/Mark A. Atkinson

Firm: ATKINSON & POLAK, PLLC

Address: P.O. Box 549, Charleston, WV 25322-0549

Telephone: (304) 346-5100

Representing:

☒ Plaintiff

☐ Defendant

☐ Cross-Defendant

☐ Cross-Complainant

☐ 3rd-Party Plaintiff

☐ 3rd-Party Defendant

☐ Proceeding Without an Attorney

Original and 3 copies of complaint enclosed/attached.

Dated: 12 / 11 / 2020

Signature: [Signature]

SCA-C-100: Civil Case Information Statement (Other than Domestic Relations)

PYMT Type K
 Rept # 534019 \$200 ☒ \$135
 Iss. Sum. + 2 cc No Sum. Iss
 Ret. to Atty. \$200 X
 Mailed CM/RM \$5 clk X
 Mailed to soc w/clk# _____
 Sent to _____ w/clk# _____ \$15 mdf X

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

LUCINDA JARRELL,

Plaintiff,

v.

CIVIL ACTION NO.: 20-C-1000

SECURITAS SECURITY SERVICES USA, INC.;

Defendant.

SUMMONS

TO THE ABOVE NAMED DEFENDANT: SECURITAS SECURITY
SERVICES USA, INC.
c/o National Registered Agents, Inc.
1627 Quarrier Street
Charleston, WV 25311-2124

ACCEPTED FOR
SERVICE OF PROCESS
2020 DEC 22 P 3:00
SECRETARY OF STATE
STATE OF WEST VIRGINIA

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby summoned and required to serve upon Mark A. Atkinson and John-Mark Atkinson, plaintiff's attorneys, whose address is Post Office Box 549, Charleston, West Virginia, 25322-0549, an answer, including any related counterclaim you may have, to the Complaint filed against you in the above-styled civil action, a true and exact copy of which is herewith delivered to you. You are required to serve your answer within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint and you will be thereafter barred for asserting in another action any claim you may have which must be asserted by counterclaim in the above-styled civil action.

Dated: 12/14/20

Cathy S. Gatson, Clerk
Clerk of the Court

Catkins
Deputy Clerk

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

COPIED
2020 DEC 14 PM 1:49
CATHY S. GATSON, CLERK
KANAWHA COUNTY CIRCUIT COURT

LUCINDA JARRELL,

Plaintiff,

v.

CIVIL ACTION NO.: 20-C-1066
Webster

SECURITAS SECURITY SERVICES USA, INC.;

Defendant.

COMPLAINT

1. The plaintiff, Lucinda Jarrell, brings this action against the defendant for its discriminatory actions against the plaintiff.

PARTIES

2. The plaintiff, Lucinda Jarrell, was at all times relevant herein, a resident of Putnam County, West Virginia.

3. The defendant Securitas Security Services USA, Inc. is a Delaware corporation and, at all times relevant herein, was doing business in Kanawha County, West Virginia.

FACTS

4. The plaintiff, Lucinda Jarrell, is fifty-three years old.
5. The plaintiff, Lucinda Jarrell, is female.
6. The plaintiff, Lucinda Jarrell, was employed by the defendant for more than fifteen years.

7. Most recently, the plaintiff was employed by the defendant as a manager.
8. In the plaintiff's district, there were eight managers.
9. The other seven managers in the plaintiff's district were male.
10. During her employment, Lucinda Jarrell consistently performed her duties in a satisfactory manner and met the reasonable expectations of her employer.
11. On or about August 3, 2020, the defendant willfully, maliciously and unlawfully terminated the plaintiff's employment.
12. The plaintiff, Lucinda Jarrell, was replaced in her employment with the defendant by a male.
13. The male that replaced the plaintiff in her employment is significantly younger than the plaintiff.

FIRST CAUSE OF ACTION

14. The plaintiff Lucinda Jarrell's termination from her employment was based upon, in whole or in part, the plaintiff's age, in violation of the West Virginia Human Rights Act, West Virginia Code §5-11-9(1).
15. As a direct and proximate result of the defendant's actions, the plaintiff has suffered and will continue to suffer lost wages and benefits in an amount to be determined by the jury.
16. As a direct and proximate result of the defendant's actions, the plaintiff is entitled to damages for indignity, embarrassment, humiliation, annoyance and inconvenience in an amount to be determined by the jury.
17. The defendant's actions were willful and malicious and violated the West Virginia Human Rights Act entitling the plaintiff to attorney fees and costs pursuant to

West Virginia Code §5-11-13 and/or the decisions of the West Virginia Supreme Court of Appeals.

18. The defendant's actions were reprehensible, willful, wanton, malicious, and/or undertaken with blatant and intentional disregard of the rights owed to the plaintiff, thereby entitling the plaintiff to punitive damages in an amount to be determined by the jury.

SECOND CAUSE OF ACTION

19. The plaintiff Lucinda Jarrell's termination from her employment was based upon, in whole or in part, the plaintiff's gender, in violation of the West Virginia Human Rights Act, West Virginia Code §5-11-9(1).

20. As a direct and proximate result of the defendant's actions, the plaintiff has suffered and will continue to suffer lost wages and benefits in an amount to be determined by the jury.

21. As a direct and proximate result of the defendant's actions, the plaintiff is entitled to damages for indignity, embarrassment, humiliation, annoyance and inconvenience in an amount to be determined by the jury.

22. The defendant's actions were willful and malicious and violated the West Virginia Human Rights Act entitling the plaintiff to attorney fees and costs pursuant to West Virginia Code §5-11-13 and/or the decisions of the West Virginia Supreme Court of Appeals.

23. The defendant's actions were reprehensible, willful, wanton, malicious, and/or undertaken with blatant and intentional disregard of the rights owed to the plaintiff,

thereby entitling the plaintiff to punitive damages in an amount to be determined by the jury.

PRAYER FOR RELIEF


WHEREFORE, the plaintiff prays for the following relief:

1. Damages set forth in this Complaint, including lost wages and benefits, back pay, front pay, and damages for indignity, embarrassment, humiliation, annoyance, inconvenience, and punitive damages in an amount to be determined by the jury;
2. Prejudgment interest as provided by law;
3. Attorney fees and costs; and
4. Such further relief as this court may deem just and equitable.

PLAINTIFF DEMANDS A JURY TRIAL ON ALL ISSUES TRIABLE TO A JURY.

LUCINDA JARRELL

By Counsel



Mark A. Atkinson (WVSB #184)
John-Mark Atkinson (WVSB #12014)
ATKINSON & POLAK, PLLC
P.O. Box 549
Charleston, WV 25322-0549
(304) 346-5100